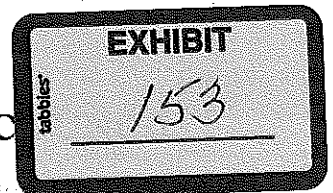


CONNECTICUT RIVER WATERSHED COUNCIL
Protecting the Connecticut River Since 1952

deKoven House 27 Washington St., Middletown, CT 06457



BUREAU OF WATER PROTECTION AND LAND REUSE
OFFICE OF THE BUREAU CHIEF

Mr. Paul Stacey

Connecticut Department of Environmental Protection

Bureau of Water Protection and Land Reuse

Planning and Standards Division

79 Elm Street

Hartford, CT 06106

FEB 03 2010

Re: Comments from CRWC on Proposed Stream Flow Standards and Regulations

Dear Mr. Stacey,

I write to you today on behalf of the Connecticut River Watershed Council in support of the proposed stream flow standards and regulations. The Connecticut River Watershed Council, Inc. (CRWC) is a nonprofit membership citizen group that was established in 1952 to advocate for the protection, restoration, and sustainable use of the Connecticut River throughout its four-state watershed. CRWC's organizational mission is directly impacted by the proposed Stream Flow Standards and Regulations.

The Connecticut River Watershed is the largest watershed that will be impacted by these standards; the Council has no doubt that this impact will benefit both the health of our waterways and the people who depend upon them.

We are pleased that these regulations set Connecticut on a path toward planning long-term, watershed-based management of our water resources as opposed to making short-term fixes as problems with water quality and availability are discovered. We stand by the Department of Environmental Protection in claiming the right to regulate the use of groundwater. The Connecticut River Watershed Council supports a holistic approach in managing our water resources that treats all parts of the water table, both surface and ground water, as a connected entity. As a case in point, the Park River in Hartford walks a fine line between surface and groundwater.

Following in this theme of connection, we agree that the regulations should be set forth for all Connecticut water bodies, not exclusively the impaired ones. If we exclude our unimpaired water bodies from regulation, they will quickly become impaired, because it will be easier and less costly to divert water from them. Furthermore, we support the Department's proposal to pass the regulations before assigning classes to Connecticut's hydrologic basins. We believe that this order of events will ensure that the classifications will be based upon diligent science rather than the lobbying of special interest groups.

It will be difficult for many golf clubs, farms, and water utilities to realize that despite the environmentally-conscious practices they may already have in place, there is more work to be done in order for our state to achieve a reasonable standard for stream flow, as set forth in the proposed regulations. Because 85% of water diverted from the Connecticut River predates the 1982 Connecticut Water Diversion Policy Act, it is imperative that the 15% of diverted water which is subject to regulation be kept to the highest environmental standards. In fact, we

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recommend that the Department ask persons owning or operating dams or other pertinent structures to submit an electronic copy of the plan to be used in making infrastructure changes rather than a statement that said individual has a plan. Having these plans on file will create the transparency needed to make water quality and availability a watershed-based community concern.

For too long, we have plundered Connecticut's waters without paying the true price for the right to use this invaluable resource at our leisure. Water usage beyond basic drinking water and sanitation is a luxury we are fortunate to have at all. It is high time that our state commits to encouraging her citizens to manage their properties to conserve water and manage rainwater effectively. Rainy periods should be as times of abundant water, should be utilized by residents to collect rain water for future use or manage their properties such that rain water infiltrates and recharges public water supplies. The benefits of maintaining local supplies of water are too great for us not to embrace the proposed stream flow regulations and their implications for future use and conservation of water in Connecticut.


Throughout CRWC's 58 year history, we have been engaging volunteers in river clean-ups, ensuring that rivers are passable for fish, publicizing water trails, and monitoring riparian development. The proposed regulations would protect the investments our staff, our members, and Connecticut residents have made in the Connecticut River watershed. Based on the fact that no one has demonstrated that the regulations are not needed to protect aquatic ecosystems, we encourage CT DEP to implement them. CRWC supports the comments of Rivers Alliance and the Farmington River Watershed Association.

We cannot continue to increase our reliance upon over-used water bodies when we know that this behavior cannot be sustained over the long-term. We urge you to move forward with the proposed stream flow regulations.

Sincerely,



Elisabeth Cianciola
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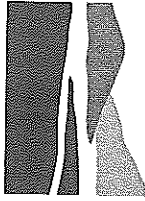


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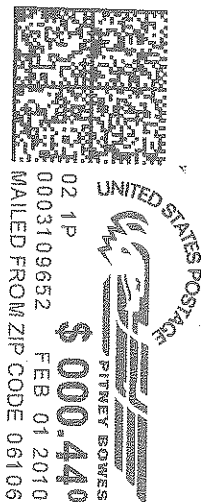
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